



February 22, 2010
VIA ECFS

Ms. Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
2009 CPNI Certification Filing for Protocall LLC

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2010-01, DA 10-91, EB Docket No. 06-36, released January 15, 2010 and pursuant to 47 C.F.R. § 64.2009(e), Protocall LLC files its Certification and attached Statement of Customer Proprietary Network information (CPNI) for the year 2009. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or stthomas@tminc.com if you have any questions about this filing.

Sincerely,

/s/Sharon Thomas
Sharon Thomas
Consultant to Protocall LLC

ST/im.

Enclosure

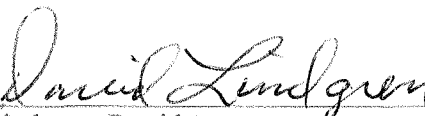
cc: Best Copy and Printing FCC@BCPIWEB.COM
D. Lindgren, Protocall
File: Protocall - FCC CPNI
TMS: FCC1001

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010:	Covering calendar year 2009
Name of company(s) covered by this certification:	Protocall LLC
Form 499 Filer ID:	826498
Name of signatory:	David Lindgren
Title of signatory:	President

1. I, David Lindgren, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



David Lindgren, President

2-17-10

Date

Attachments: Accompanying Statement explaining CPNI procedures

Protocall, LLC
Statement of CPNI Procedures and Compliance

Protocall, LLC ("Protocall" or "the Company") operates as a payphone provider and inmate service provider, providing "coin in the box" pay telephone service and operator assisted call completion services for transient end users. The Company also offers a prepaid account service for the family and friends of inmates of confinement facilities. With the exception of this prepaid account offering, Protocall's services consist of casual traffic provided outside of any subscribed service relationship in which the Company does not have information that relates to the quantity, technical configuration, type, or location of the end use customer's service. The Company does obtain CPNI, including call detail information, with respect to its prepaid account offering. However, it does not use this information for any marketing purposes and strictly prohibits unauthorized use or disclosure of this information.

The Company has processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail. For operator assisted calls, the called party's local phone company bills collect calls and has its own controls for disclosure and access to this information. For prepaid accounts where the Company manages the account information, the Company has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Customers are authenticated at the time of service initiation, when the customer's identify is readily authenticated. At that time, at the customer's request, a password is issued, which does not rely upon readily available biographical information or account information. The answers for two security questions are also obtained.

If the customer cannot provide the correct password and cannot answer either of the two security questions correctly, the customer must set up a new account and the old account remains intact. The Company does not disclose call detail over the telephone in response to a customer-initiated inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative.

During 2010, the Company may initiate an online version of this prepaid account service. If so, we will institute authentication procedures to safeguard the disclosure of CPNI on-line. These procedures will not require the use of readily available biographical information or account information as defined by the FCC. The Company will authenticate customers at the time of service initiation when the customer establishes a password for online access. Passwords will not rely on readily available biographical information or account information. Unless the appropriate password is provided, the Company will not allow on-line access to CPNI. If a customer loses or forgets their password, the customer's identify will be re-authenticated without the use of readily

available biographical information or account information. Those re-authenticated will be given a new password.

The Company will immediately notify customers whenever a password, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

The Company does not have any retail locations and therefore does not disclose CPNI in-store.

All contracts with correctional facilities specify that call detail is the sole property of the correctional facility and that the Company must only disclose or allow access to this data by a) authorized correctional facility personnel, b) the paying party for billing purposes, or c) technical support personnel for the purpose of technical and billing support purposes only. Correctional Facility Personnel and Company personnel must have a valid user ID and password in order to access this data at any time. This access authorization is handled on-site by the highest level facility personnel. The administrator at each location will also establish and manage the process for any lost password replacement.

Any other requests for call detail by outside parties are referred to designated management personnel at the correctional facilities whose responsibility it is to release the information to the appropriate legal authorities according to their own procedures. Should the Company ever be required provide call records itself, it would do so only subject to subpoena, and records kept in accordance with the applicable rules.

The Company has procedures in place to notify law enforcement in the event of a breach of the CPNI. There have been no such breaches during 2009, but the Company has a process in place to maintain records of any breaches discovered and to make notifications to the USSS and the FBI in a manner consistent with FCC rules.

The Company did not take any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2009.

The Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.